



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 West 15<sup>th</sup> Street, Suite 3200  
HELENA, MONTANA 59626

Ref: 8MO

October 28, 2009

Ms. Deborah L.R. Austin  
Forest Supervisor  
Lolo National Forest  
Building 24A, Fort Missoula  
Missoula, Montana 59804

Re: CEQ 20090347; Butte Lookout Project Final  
Environmental Impact Statement

Dear Ms. Austin:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) for the Butte Lookout Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to EPA's DEIS comments, as well as responses to the comments of other agencies and the public. We remain supportive of the purpose and need of the Butte Lookout Project to rehabilitate degraded aquatic conditions, promote more diverse vegetative conditions, and reduce high intensity wildfire. We are pleased that the proposed project includes decommissioning of 5 miles of road; placing 0.6 miles of road in storage; replacing an undersized culvert and narrowing 2 miles of Road #451; and removing a culvert at the West Fork Butte Creek tributary on the north side of the watershed.

The FEIS states that the rehabilitative and restorative portions of the proposed project are consistent with the Lolo Creek TMDL and Water Quality Plan, and would complete several of the action items identified in the TMDL/Water Quality Plan, and that future actions would help address all requirements. It is worth noting that the overall project should be consistent with the Lolo Creek TMDL and Water Quality Plan, (i.e., including both the resource development and restorative portions of the project, since the project includes 1274 acres of commercial timber treatments). The restorative components of the project should offset and/or compensate for sediment delivery to 303(d) listed streams that may occur as a result of the other portions of the overall project. The South Fork of Lolo Creek and Lolo Creek are both 303(d) listed streams, although only Lolo Creek is listed for impairment due to sediment. We are pleased that the proposed project includes planning to minimize sediment delivery during timber harvests, with only 166 acres of tractor logging, and only 0.2 miles of permanent road, 0.7 miles of short-term specified road, and 0.5 miles of temporary road.

We appreciate the inclusion of many rehabilitative and restorative actions in the proposed project, although we remain somewhat concerned that significant portions of the proposed rehabilitative and restorative work are not currently funded (i.e., decommissioning of 7 miles of roads on the National Forest road system, and 10 miles of unclassified historic roads; decommissioning of 12 miles of jammer roads; and replacing 4 culverts and removing one culvert). We are encouraged that the FEIS states that all the proposed rehabilitative and restorative work will be done when funding becomes available, and that the project is supporting the implementation of additional watershed restoration activities by including the activities in its plan of work. We encourage timely funding of the remainder of the proposed rehabilitative and restorative work.

Also, we appreciate the discussion of existing management of National Forest System Roads (pages 243-250). It is important that system roads be properly maintained with routine BMP improvements on an on-going basis to minimize sediment delivery to streams. It is known that prolonged under-funding of road maintenance on National Forests has resulted in degraded road conditions, and that there is a significant backlog of road maintenance needs on National Forests (Source: *"Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis*, March 22, 2007). We believe it is important to focus attention on the adequacy of funding to maintain and improve roads to reduce adverse effects on water quality and fisheries. We encourage improved funding for properly maintaining system roads, as well as decommissioning unneeded roads which cause resource damages and which cannot be adequately maintained. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities.

The EPA appreciates the opportunity to review and comment during the EIS process. If you have any questions regarding our input please contact Mr. Stephen Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. We thank you for your consideration.

Sincerely,

Julie A. DalSoglio  
Acting Director  
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver  
Robert Ray/Mark Kelley, MDEQ, Helena, MT